

COHEN & GREEN

November 17, 2022

Hon. Ona T. Wang
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Case No. 22-cv-01445, Rodney v City of New York, et al.

Dear Judge Wang:

As the Court likely recalls, my firm, with co-counsel, represents Plaintiff in the case above. As directed by the Court (Dkt. No. 43), I write jointly with counsel for Defendants to provide a monthly status report.

Per the Court's Order, the parties have now exchanged initial disclosures. Plaintiff served discovery demands on October 27, and Defendants intend to do so before the deadline set in the schedule. Defendants are on track to respond to Plaintiff's requests in the time set by the Rules. After a stipulated extension, Defendants identified a subset of the (non-policymaker) John and Jane Doe Defendants (specifically, those who were in uniform), and the Court extended their time to identify the remaining, plainclothes (non-policymaker) Does. *See* Dkt. Nos. 57 and 58.

As far as settlement is concerned, the Court held a preliminary, confidential settlement discussion on November 3, and Plaintiff served a formal demand that evening. Nothing further has taken place, and the parties believe a further conference would be premature at this time.

Finally, as far as briefing, the pending motion to dismiss should be fully briefed as of December 2, 2022. Per the Court's Order, the Public Advocate and LatinoJustice have submitted their amicus brief on the motion.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN & GREEN P.L.L.C.

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cc:

All relevant parties by electronic filing.